

COHN LIFLAND PEARLMAN
HERRMANN & KNOPF LLP
PETER S. PEARLMAN
JEFFREY W. HERRMANN
Park 80 Plaza West-One
Saddle Brook, NJ 07663
Telephone: 201/845-9600
201/845-9423 (fax)

Liaison Counsel

ROBBINS GELLER RUDMAN
& DOWD LLP
ARTHUR C. LEAHY
THEODORE J. PINTAR
JEFFREY D. LIGHT (159515)
SHANNON M. MATERA
FRANCIS A. DIGIACCO
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

HOWARD CHARATZ, Individually
and On Behalf of All Others Similarly
Situating,

Plaintiff,

vs.

AVAYA, INC., et al.,

Defendants.

) No. 3:05-cv-02319-MLC-TJB
) **(Consolidated)**

) CLASS ACTION

) DECLARATION OF PETER S.
) PEARLMAN FILED ON BEHALF OF
) COHN LIFLAND PEARLMAN
) HERRMANN & KNOPF LLP IN
) SUPPORT OF APPLICATION FOR
) AWARD OF ATTORNEYS' FEES
) AND EXPENSES

I, PETER S. PEARLMAN, declare as follows:

1. I am a member of the firm of Cohn Lifland Pearlman Herrmann & Knopf LLP. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses in connection with services rendered in the above-entitled action.

2. This firm is counsel of record for plaintiff[s]: City of Livonia Employees' Retirement System; National Elevator Industry Pension Fund; and District No. 9, I.A. of M. & A.W. Pension Fund

3. The identification and background of my firm and its partners is attached hereto as Exhibit A.

4. The total number of hours spent on this litigation by my firm is 212.34. The total lodestar amount for attorney/paralegal time based on the firm's current rates is \$113,109.10. The hourly rates shown below are the usual and customary rates charged for each individual in all of our cases. A breakdown of the lodestar is as follows:

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Peter S. Pearlman	(P)	187.52	\$575	\$107,824
Jeffrey W. Herrmann	(P)	2.73	\$550	\$1,501.50
Robert D. Zatorski	(P)	1.67	\$440	\$734.80
Audra DePaolo	(A)	1.0	\$330	\$330.00
Michael Fourte	(LC)	.17	\$140	\$23.80
Hal Hodes	(LC)	19.25	\$140	\$2,695.00
TOTAL:		212.34		113,109.10

(P) Partner

(A) Associate

(LC) Law Clerk

5. My firm incurred a total of \$3,618.80 in expenses in connection with the prosecution of this litigation. They are broken down as follows:

EXPENSES

From Inception to June 30, 2010

<i>EXPENSE CATEGORY</i>	<i>TOTAL</i>
Meals, Hotels & Transportation	\$400.25
Photocopies	\$1231.35
Postage	\$89.82
Telephone, Facsimile	\$80.14
Messenger, Overnight Delivery	\$449.02
Filing, Witness & Other Fees	\$705.00
Court Reporters	\$286.00
Lexis, Westlaw, Online Library Research	\$377.22
Class Action Notices/Business Wire	
Mediation Fees	
Experts/Consultants/Investigators	
Outside:	
In-House:	
Assessments	
<i>TOTAL</i>	<i>\$3,618.80</i>

6. The following is additional information regarding these expenses:

- (a) Photocopying:
 In-house (2915 copies @ \$0.35 per copy): \$1,020.25
 Outside Photocopy Expenses: \$211.10

<i>DATE</i>	<i>VENDOR</i>
06/30/05	Printing
10/17/05	Staples – color copies

- (b) Filing, Witness and Other Fees: \$705.00.

DATE	VENDOR
4/29/05	United States District Court – District of New Jersey
11/28/06	United States District Court – District of New Jersey

(c) The firm incurred expenses of \$286.00 for amounts paid to court reporters for transcripts of court hearings and depositions.

DATE	VENDOR
8/25/06	J&J Transcribers
9/22/06	J&J Transcribers

(d) Meals, Hotels and Transportation: \$400.25. Expenses for out-of-town meals, hotels and transportation were incurred for the following purposes:


NAME	DATE	DESTINATION	PURPOSE
Peter S. Pearlman	8/1/05	Trenton	Hearing, U.S.District Court, DNJ
	8/14/06		
	11/19/09		
	3/2/08	Philadelphia	Hearing, Third Circuit

(e) Lexis, Westlaw, Online Library Research: \$377.22. These included vendors such as Disclosure, Inc., Dow Jones Interactive, Dow Jones & Co., Inc., Lexis Nexis, CDA Investment Technologies, Pacer Service Center, West Publishing Corporation and Choice Point. These databases were used to obtain access to SEC filings, legal research and cite-checking of briefs. The charges for these vendors vary depending upon the type of services requested.

7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers, check records and other documents and are an accurate record of the expenses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of July, 2010.



Peter S. Pearlman